

Multiline Product Submissions FAQs



1. *What are multiline product submissions?*

- a. Multiline product submissions typically include multiple benefits or features that cross between life, health, and/or property and casualty lines of coverage.

2. *What are some important considerations that should be taken into account prior to filing multiline submissions?*

- a. The submitter should consider coverage interdependencies created by combining multiple lines of coverage into one product, including whether any interdependency may necessitate or serve as a basis for cancellation of one or more of the coverages included in the multiline product.

Additionally, given the discrete requirements in state and federal law that apply to different lines of coverage, the submitter should consider the experience of the consumer when it is developing the policy documents.

The Department will expect compliance with each applicable statute and regulation as it applies to each line of coverage in the multiline product.

3. *What is the filing process for multiline submissions?*

- a. When filing a product that contains multiple lines of coverage, the Department may expect multiple filings to ensure a thorough review for all requirements across lines of coverage. For example, the Department would expect a multiline product with accident and health coverage in addition to property and casualty coverage to be filed with both the Life, Accident, and Health Bureau as well as the Property and Casualty Bureau.

All SERFF IDs associated with the product should be linked to facilitate efficient review.

4. *Are there specific considerations for filing multiline products in SERFF?*

- a. In addition to all SERFF IDs being linked as stated in the answer to question 3 above, the multiline submission should use the Type of Insurance (TOI) and Sub-Type in SERFF that best align with the submission. Additional general instructions are available in SERFF as in the Department's filing checklists, which can be found here:

<https://www.insurance.pa.gov/Companies/ProductAndRateRequire/Pages/default.aspx>

5. Are there specific considerations for applications for multiline products?

- a. A single application for all of the lines of coverage in a proposed multiline product may be considered. Please note that it may be subject to review from each appropriate Bureau and that it must be fully compliant with all applicable statutory and regulatory requirements.

6. Are there specific considerations for billing related to multiline products?

- a. The Department will expect any billing documents and correspondence to clearly set forth premium and premium payment details for each line of coverage in the policy within the multiline product. The policy language related to billing and premium processing must comply with the applicable statutory and regulatory requirements for each line of coverage in the product.

7. Are there specific considerations for claims administration for multiline products?

- a. The Department will expect policy language that clearly sets forth the deductibles, benefit triggers, coordination of benefits, and other policy provisions that may affect the administration of claims under any of the lines of coverage within a multiline product

8. Are there specific considerations for advertising multiline products?

- a. Any advertising for multiline products must satisfy the Commonwealth's advertising laws and regulations. For more specific information, please refer to the Department's filing checklists, including the checklist for advertising requirements, which highlight the Commonwealth's statutory and regulatory requirements.

9. Are there specific considerations for marketing multiline products?

- a. A product that contains multiple lines of coverage may be marketed as one product; however, consumers should be informed of how the multiple lines of coverage contained in the product will operate and how that will affect, for example, cancellation, premium payment, and claim payment.

10. Are there specific licensing considerations for producers that market and/or sell multiline products?

- a. The Department expects producers to have lines of authority that correspond to the lines of coverage in the products they market and/or sell. For a multiline product, the producer should have each of the lines of authority that correspond to each line of coverage in the multiline product.

Continuing education requirements are set forth on the Department's website and may be found here:

<https://www.insurance.pa.gov/Licensees/MaintainYourLicense/Pages/default.aspx>